

Sher:	A.L. Taylor
Brace:	11.9
Other:	

March 10, 1980

Ford Motor Company
Louisville Assembly Plant
P.O. Box 32990
Louisville, Kentucky 40232

Attention: Mr. D.R. Baker
Plant Manager

Dear Mr. Baker:

Your letter of February 6, 1980, proposing to remove a number of "Ford" labeled drums from the A.L. Taylor site has been carefully reviewed and discussed by this Department. Your plan for removal is approved in principle. However, the number of drums identified is alarming, as this will make the remaining surface clean-up more costly.

The Department needs the analytical data on the materials in the identified drums. And due to the sensitivity of this site we must reserve the right to approve laboratory facilities and also split future samples.

The cooperation of this Department should not be construed to be a release or waiver on any rights the Department may have to request further action on your part. However, the Department recognizes the utility of the Taylor site and in so recognizing takes note of the value of this step in the clean-up of the site initiated by Ford Motor Company.

The Department must take the position on the clean-up plan proposed by Ford that all of those statutory and regulatory requirements regulating hazardous waste management are to be observed. The comments in the Appendix to this letter indicate areas of concern and areas where special efforts will have to be made to insure an environmentally sound disposal of the materials removed.

In summary, you have this Department's authority to proceed with the understanding that performance standards and environmentally sound disposal is the goal. Every assistance will be rendered to help you achieve environmentally sound and safe disposal of those materials that you propose to remove from the Taylor site. Should you have any questions about the Appendix



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comments please feel free to contact the Division of Hazardous Material and Waste Management, 1121 Louisville Road, Pine Hill Plaza, Frankfort, Kentucky, 40601, or phone 502-564-2424 for a more detailed explanation of the regulatory requirements. We welcome your efforts to assist in the clean-up of the "Valley of the Drums".

Respectfully Yours,

Jack A. Wilson, Commissioner
Department for Natural Resources
and Environmental Protection

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attachment

1. Ford registration as a generator of hazardous waste will enable the movement of the identified drums. All materials moved from the Taylor property should be thoroughly identified as to type of waste, quantity and place of disposal or future storage. The manifest tracking procedure should be used even if the material is moved prior to the full implementation of the state's manifest system.
2. When the liquid is pumped into the transport tanker, Ford Motor Company and the Department should split samples under the auspices of the Division of Hazardous Material and Waste Management for analysis to determine the suitability for incineration.
3. At the time of sampling, the tanker should be sealed by the Department until opened for disposal at the L.W.D., Incorporated., Calvert City facility or such other facility as may be deemed necessary after review of the analytical data.
4. Materials and empty drums moved from this site must be moved in accordance with Department of Transportation (State and Federal) regulations. The Division of Hazardous Material and Waste Management shall be notified in advance of the liquid movement, an inspector in a state vehicle will serve as escort to the disposal facility.
5. Segregation of sludges, waste oils, etc. at the Louisville plant should be conducted under the auspices of inspectors of the Division of Hazardous Material and Waste Management.
6. In the event any drum contents are significantly dissimilar to currently generated Ford Motor Company wastes the company shall take such an action to dispose of those materials as would be required under the presently in force hazardous waste regulations after consultation with the Department. It should be understood that authorities and letters of permission from this Department currently in force will not cover dissimilar materials discovered in the removed drums.